

1 MICHAEL S. KECK (SBN 124536)  
 2 LAW OFFICES OF C. L. KECK  
 3 1390 Market Street, Suite 228  
 4 San Francisco, CA 94102  
 5 415-861-2267 : voice  
 6 415-431-1617 : fax  
 7 email: keckmike@aol.com

E-filing

8 Attorneys for Plaintiff JAMES MURRAY

9 UNITED STATES DISTRICT COURT  
 10 NORTHERN DISTRICT OF CALIFORNIA  
 11 SAN FRANCISCO DIVISION

12 JAMES MURRAY,

13 Plaintiff,

14 v.

15 UNITED STATES OF AMERICA,

16 Defendant.

No. C 04-3707 MMC  
 E-FILING CASE

STIPULATION FOR PROTECTIVE ORDER  
FOR TRADE SECRET

[FRCP, Rule 26(c)(7)]

17 IT IS HEREBY STIPULATED by the parties hereto, through their  
 18 respective counsel that any and all financial information produced  
 19 by Plaintiff JAMES MURRAY pursuant to discovery requests in this  
 20 litigation, including, but not limited to: income information;  
 21 financial information; investor information; customer lists;  
 22 customer contacts; correspondence; proposals; notes; memoranda;  
 23 commissions or draws received and from whom; referrals paid;  
 24 commission negotiations and any other writing as defined by  
 25 Evidence Code §250; are " **TRADE SECRET OR OTHER CONFIDENTIAL**  
 26 **RESEARCH** " as defined by Federal Rules of Civil Procedure, Rule  
 27 26(c)(7).

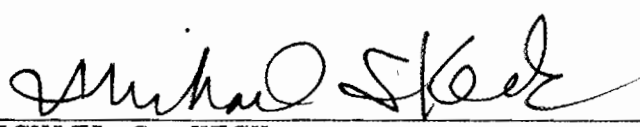
28 THE PARTIES FURTHER STIPULATE that a protective order is  
 necessary that this court may issue a protective order limiting

1 the dissemination of the parties' respective trade secrets  
2 pursuant to Federal Rules of Civil Procedure Rule 26(c)(7) as  
3 follows:

- 4 1. The trade secret may be disseminated only to counsel for the  
5 parties, including their associate attorneys, paralegals and  
6 investigators, consultants and retained experts;
- 7 2. The parties may view disclosed trade secret only in the  
8 presence of their respective counsel, or if not in the  
9 presence of their respective counsel, at counsel's office;
- 10 3. Any party seeking to show the trade secret, or articles  
11 containing the trade secret, to any person not designated by  
12 this protective order without either the notice and consent of  
13 the owner of the trade secret or shall first obtain this  
14 court's approval to do so;
- 15 4. No articles disclosing the trade secret shall be filed or  
16 otherwise made a part of the court record available to the  
17 public without approval of the court and prior notice to the  
18 owner of the trade secret; and,
- 19 5. The court may issue other orders as it deems necessary to  
20 protect the integrity of the trade secret.

21 THE PARTIES FURTHER STIPULATE that any breach of this order,  
22 or disclosure, may be considered contempt of a lawful court order.

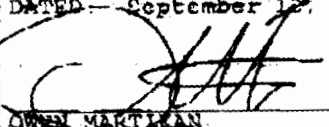
23 DATED: September 12, 2005

24   
25 \_\_\_\_\_  
26 MICHAEL S. KECK  
27 Law Offices of C. L. Keck  
28 Attorney for Plaintiff

///  
28

///  
28

1 DATED: September 23, 2005

2  
3   
4 OWEN MARTIN  
5 Assistant US Attorney  
6 Attorney for Defendant

7 IT IS SO ORDERED.

8 DATED: \_\_\_\_\_, 2005

9  
10 JUDGE, of the Court

11  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28  
29  
30  
Stipulation for Protective Order:  
C 04-3707 MMC

3

TOTAL P.03

1 DATED: September 12, 2005  
2  
3

4 OWEN MARTIKAN  
5 Assistant US Attorney  
6 Attorney for Defendant

7 IT IS SO ORDERED.

8 DATED: FEB 24 2006, ~~2005~~  
9

10 Walter M. Cheney  
11 JUDGE, of the Court  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28